

Eric J. Goodman (CA State Bar No. 210694)
GOODMAN MOONEY, LLP
18012 Cowan, 2nd Floor
Irvine, California 92614
Telephone: (949) 622-0020
Email: litigation@goodmanmooney.com

Gregory P. Goonan (CA State Bar No. 119821)
THE AFFINITY LAW GROUP
5230 Carroll Canyon Road, Suite 230
San Diego, California 92121
Telephone: (858) 412-4296
Email: ggoonan@affinity-law.com

Attorneys for Plaintiff
CLAIMTEK, LLC, dba CLAIMTEK SYSTEMS

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

CLAIMTEK, LLC dba CLAIMTEK
SYSTEMS, a California limited liability
corporation,

Plaintiff,

v.

MED OFFICE GROUP INC., a Colorado
corporation; JOHN WARREN, an
Individual; and DOES 1 through 10,
Inclusive,

Defendants.

Case No. 8:22-cv-01696-FWS-DFM

**NOTICE OF MOTION AND
MOTION BY PLAINTIFF FOR
ENTRY OF DEFAULT
JUDGMENT AGAINST
DEFENDANTS MED OFFICE
GROUP, INC. AND JOHN
WARREN**

Date: February 15, 2024
Time: 10:00 am
Court: 10D (Hon. Fred W. Slaughter)

TO THE COURT, THE PARTIES HERETO AND THEIR ATTORNEYS
OF RECORD:

1. Notice of Motion and Hearing:

PLEASE TAKE NOTICE that on February 15, 2024, at 10:00 a.m., or as
soon thereafter as counsel may be heard, in Courtroom 10D of the above-entitled
court, located at 411 W 4th St, Santa Ana, California 92701, plaintiff CLAIMTEK,

1 LLC dba CLAIMTEK SYSTEMS will, and hereby does, move the court for an
2 order entering default judgment against defendants MED OFFICE GROUP, INC.
3 and JOHN WARREN individually.

4 2. Grounds:

5 This motion is made pursuant to Rule 55(b) of the Federal Rules of Civil
6 Procedure on the ground that defendants MED OFFICE GROUP, INC. and JOHN
7 WARREN individually failed to file a timely response to Plaintiff's Complaint in
8 this action or otherwise timely plead or defend in this action.

9 3. Supporting Documents:

10 This motion is based upon the following: (i) this notice of motion and motion;
11 (ii) the supporting memorandum of points and authorities filed herewith under
12 separate cover; (iii) the Declarations of Eric Goodman and Khalil Farhat filed
13 herewith under separate cover in support of this motion; (iv) the files and records in
14 this matter; and (v) such other and further matters as the court may properly
15 consider in connection with this motion.

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18 Dated: January 4, 2024

THE AFFINITY LAW GROUP

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20 By: 

Gregory P. Geonan
Attorneys for Plaintiff